

IN THE UNITED STATES DISTRICT COURT

FILED 29 NOV '12 15:08 USDC-ORP

FOR THE DISTRICT OF OREGON

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PORTLAND DIVISION

UNITED STATES OF AMERICA

3:12-cr- 00628-SI
INDICTMENT

v.

DUSTIN MICHAEL TIETZE, and
PAUL WELLINGTON PACKARD,

Defendants.

18 U.S.C. §§ 2, 1708, 1028A, 1344
AIDING AND ABETTING,
POSSESSION OF STOLEN MAIL,
AGGRAVATED IDENTITY THEFT,
BANK FRAUD.

THE GRAND JURY CHARGES:

COUNT 1
POSSESSION OF STOLEN MAIL

On or about June 1, 2012, in the District and State of Oregon, **DUSTIN MICHAEL TIETZE**, and **PAUL WELLINGTON PACKARD**, defendants herein, knowingly possessed a Chase Bank Check, Account Number xxxxx4852, payable to the order of James "K." that had been mailed to a resident of Portland, Oregon, well knowing that said personal check had been stolen from the United States mail, all in violation of Title 18, United States Code, Sections 2 and 1708.

COUNT 2
POSSESSION OF STOLEN MAIL

On or about June 12, 2012, in the District and State of Oregon, **DUSTIN MICHAEL TIETZE**, defendant herein, knowingly possessed a U.S. Bank Check, Account Number xxxxxxxx0568, check number 12041, in the sum of \$1,850, payable to the order of Dustin Tietze, that had been mailed to Jeryl Petxxxx, and Michael Petxxxx, residents of Portland, Oregon, well knowing that said personal check had been stolen from the United States mail, all in violation of Title 18, United States Code, Section 1708.

COUNT 3
POSSESSION OF STOLEN MAIL

On or about June 14, 2012, in the District and State of Oregon, **DUSTIN MICHAEL TIETZE**, defendant herein, knowingly possessed a U.S. Bank Check, Account Number xxxxxxxx0568, check number 12045, in the sum of \$1,400, payable to the order of Dustin Tietze, that had been mailed to Jeryl Petxxxx, and Michael Petxxxx, residents of Portland, Oregon, well knowing that said personal check had been stolen from the United States mail, all in violation of Title 18, United States Code, Section 1708.

COUNT 4
POSSESSION OF STOLEN MAIL

On or about July 11, 2012, in the District and State of Oregon, **DUSTIN MICHAEL TIETZE**, defendant herein, knowingly possessed a Bank of America check, Account Number xxxxxxxx0476, check number 1151, in the sum of \$1,200, payable to the order of Dustin Tietze, that had been mailed to Roderick and Cynthia Merxxxx, residents of Portland, Oregon, well knowing that said personal check had been stolen from the United States mail, all in violation of Title 18, United States Code, Section 1708.

COUNT 5
POSSESSION OF STOLEN MAIL

On or about July 11, 2012, in the District and State of Oregon, **DUSTIN MICHAEL TIETZE**, defendant herein, knowingly possessed a Bank of America check, Account Number xxxxxxxx1342, check number 200, in the sum of \$1,000, payable to the order of Dustin Tietze, that had been mailed to Diane McLauxxxxx, a resident of Portland, Oregon, well knowing that said personal check had been stolen from the United States mail, all in violation of Title 18, United States Code, Section 1708.

COUNT 6
AGGRAVATED IDENTITY THEFT

On or about June 1, 2012, in the District and State of Oregon, **DUSTIN MICHAEL TIETZE**, and **PAUL WELLINGTON PACKARD**, defendants herein, did knowingly possess and use, without lawful authority, a means of identification of another person, to wit: a J.P. Morgan Chase Bank, N.A., check number 1124, account number xxxxx4852 of Keith xxxxx, and Contexxxxx, L.L.C., during and in relation to a felony crime of bank fraud, punishable under Title 18, United States Code, Section 1344; all in violation of Title 18, United States Code, Sections 2 and 1028A(1).

COUNT 7
AGGRAVATED IDENTITY THEFT

On or about July 7, 2012, in the District of Oregon, **DUSTIN MICHAEL TIETZE**, defendant herein, did knowingly possess and use, without lawful authority, a means of identification of another person, to wit: a U.S. Bank credit/debit card, number xxxxxxxx6891 of Kristina Privxxxxx, during and in relation to a felony crime of bank fraud, punishable under Title 18, United States Code, Section 1344; to wit: by possessing a stolen U.S. Bank credit/debit card and Personal Identification Number (PIN) of Kristina Privxxxxx, and Paul Privxxxxx, and by conducting four (4) debit transactions of \$104.99, \$279.99, \$121.98, and \$303.00 for a total of \$809.96 with the said credit/debit card owned by Kristina Privxxxxx, and Paul Privxxxxx, all in violation of Title 18, United States Code, Sections and 1028A(1).

COUNT 8
AGGRAVATED IDENTITY THEFT

On or about July 7, 2012, in the District of Oregon, **DUSTIN MICHAEL TIETZE**, defendant herein, did knowingly possess and use, without lawful authority, a means of identification of another person, to wit: a U.S. Bank credit/debit card, number xxxxxxxx6891 of Kristina Privxxxxx, during and in relation to a felony crime of bank fraud, punishable under Title 18, United States Code, Section 1344; to wit: by possessing a stolen U.S. Bank credit/debit card and Personal Identification Number (PIN) of Kristina Privxxxxx, and Paul Privxxxxx, and by transferring \$1,000 from the U.S. Bank account of Paul Privxxxxx to the U.S. Bank account of Kristina Privxxxxx, all in violation of Title 18, United States Code, Sections and 1028A(1).

COUNT 9
BANK FRAUD

On or about June 1, 2012, through June 6, 2012, in the District of Oregon, **DUSTIN MICHAEL TIETZE**, and **PAUL WELLINGTON PACKARD**, defendants herein, did knowingly execute a material scheme or artifice to defraud On Point Credit Union, a financial institution insured by the National Credit Union Administration, and did obtain money by means of materially false and fraudulent pretenses, representations and promises, to wit: by sharing an On Point Credit Union bank debit card and Personal Identification Number (PIN) belonging to **PAUL WELLINGTON PACKARD**, and by depositing three stolen checks totaling \$3,820.00 into the On Point Credit Union account of **PAUL WELLINGTON PACKARD**, to wit: account number xxxxx0022, and by thereafter withdrawing through purchases and cash withdrawals the sum of \$1,265.94 in funds maintained in the On Point Credit Union account number xxxxx0022 of **PAUL WELLINGTON PACKARD**, well knowing that the stolen checks deposited into On Point Credit Union account number xxxxx0022 of **PAUL WELLINGTON PACKARD** would not be honored; all in violation of Title 18, United States Code, Section 1344.

COUNT 10
BANK FRAUD

On or about July 7, 2012, in the District of Oregon, **DUSTIN MICHAEL TIETZE**, defendant herein, did knowingly execute a material scheme or artifice to defraud U.S. Bank, a financial institution insured by the Federal Deposit Insurance Corporation, and did obtain money by means of materially false and fraudulent pretenses, representations and promises, to wit: by stealing, possessing, and using a U.S. Bank credit/debit card, number xxxxxxxx6891 of Kristina Privxxxxx, as well as stealing, possessing, and using a Personal Identification Number (PIN) of Kristina Privxxxxx, and by transferring \$1,000 from the U.S. Bank account of Paul Privxxxxx to the U.S. Bank account of Kristina Privxxxxx, all in violation of Title 18, United States Code, Section 1344.

COUNT 11
BANK FRAUD

On or about July 7, 2012, in the District of Oregon, **DUSTIN MICHAEL TIETZE**, defendant herein, did knowingly execute a material scheme or artifice to defraud U.S. Bank, a financial institution insured by the Federal Deposit Insurance Corporation, and did obtain money by means of materially false and fraudulent pretenses, representations and promises, to wit: by stealing, possessing, and using a U.S. Bank credit/debit card, number xxxxxxxx6891 of Kristina Privxxxxx, as well as stealing, possessing, and using a Personal Identification Number (PIN) of Kristina Privxxxxx, and by conducting four (4) debit transactions of \$104.99, \$279.99, \$121.98, and \$303.00 for a total of \$809.96 with the said credit/debit card owned by Kristina Privxxxxx, all in violation of Title 18, United States Code, Section 1344.

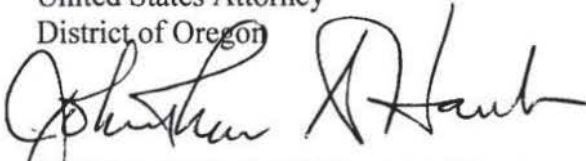
Dated this 28th day of November 2012.

A TRUE BILL

OFFICIATING FOREPERSON

Presented by:

S. AMANDA MARSHALL
United States Attorney
District of Oregon


JOHNATHAN S. HAUB, OSB #76165
Assistant United States Attorney